

PARKER HANSKI LLC

40 WORTH STREET, 10TH FLOOR
NEW YORK, NEW YORK 10013
PHONE: 212.248.7400
FAX: 212.248.5600
Contact@ParkerHanski.com

March 25, 2020

Via ECF

The Honorable Alison J. Nathan
United States District Judge
Southern District of New York

Re: *Dedra De La Rosa v. Aspenly Co. LLC and Pure Green NYC 8th Street Corp*

Docket No. 1:18-cv-03456 (AJN)(GWG)

Dear Judge Nathan:

We represent the plaintiff in the above-entitled action. Given that defendant has recently been granted permission to serve expert disclosures by April 17, 2020 (See ECF Document # 96), we write to respectfully ask the Court to consequently provide plaintiff until May 15, 2020 to review defendant's expert disclosures with plaintiff's expert and to take the deposition of defendant's expert. The current trial schedule does not provide plaintiff with sufficient time to analyze and take an expert deposition especially in light of the current health emergency that makes it uncertain as to when plaintiff can take this deposition. Specifically, the Joint Pretrial Order is due on May 1, 2020 and the Trial is scheduled for May 11, 2020. Accordingly, plaintiff respectfully asks the Court to adjourn the trial schedule to June 2020.

Thank you for your time and attention to this matter. With kindest regards, I am

very truly yours,

/s/
Glen H. Parker, Esq.